

February 23, 2004

Federal Communications Commission Secretary
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

Dear Commission Secretary,

I am writing on behalf of the National Organization of State Offices of Rural Health in response to your request for comment regarding the November FCC Notice of Proposed Rulemaking. Specifically, we are commenting on "definition of rural area."

Currently, the Universal Service Mechanism uses the OMB definition of non-metropolitan county or the Federal Office of Rural Health Policy's (FORHP) Goldsmith Modification definition. Your notice indicates that some commentators suggest that you adopt the rural designation system currently utilized by the FORHP, the Rural Urban Community Area (RUCA) system.

It is our opinion that none of these definitions can be applied to all rural areas of the county. When the RUCA system was adopted by the FORHP, some small rural areas became ineligible for Federal grants. Similarly, during the former utilization for the Goldsmith Modification method, other small geographic areas were found to be ineligible for Federal funding opportunities.

It our recommendation that the Commission adopt a multiple method of defining rural. We further recommend that your previous definition of utilizing either OMB or Goldsmith be retained, and that you simply add RUCA as a third alternative.

We recognize that the Commission is committed to bringing Universal Service discounts to as many eligible entities as possible that want access to telehealth services. Only a multiple definition will meet the needs of rural America.

Sincerely,

Dennis Berens
President
National Organization of State Offices of Rural Health